

Dear FCC,

This is in regards to petition RM-10809 filed by the Puerto Rico Amateur Radio League (PRARL) in which they ask the Commission to delete Element 1 for Technician and General classes but to increase the rigor of the written elements for those two license classes. The PRARL would keep the 5 WPM Morse exam for Extra applicants. The PRARL also would eliminate same-session retesting and require 30 days between retakes.

In my opinion, the Morse code testing requirement should remain as it is now and should not be changed or removed for HF access for any license class.

Lots of radio amateurs have taken and passed the Morse code examination requirement over the years for HF access, even when it was at 20 wpm. They continue to pass the Morse code exams even now at the slow speed of 5 wpm. There has even been an increase of Extra Class licensees. This shows that Morse code testing is not a hindrance, limiting, or preventing licensed amateurs from upgrading nor is it preventing people from getting an amateur radio license.

More emphasis should be placed on amateurs improving their operating practices while on the air and on knowing and understanding the Amateur Radio Service Rules and Regulations. Same session exam retakes should require a 30 day waiting period too.

I say no to RM-10809

Sincerely,

Victor Magana, N1VM